

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X

**IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**Civil Action No.
03 MDL 1570 (RCC)**

-----X

This document relates to:

Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-7279 (S.D.N.Y.)

World Trade Center Properties, et al. v. Al Baraka Investment and Development Corp, et al., Case No. 04-CV-7280 (S.D.N.Y.)

**PLAINTIFFS' MORE DEFINITE STATEMENT AS TO
DEFENDANTS AL FAROOQ MOSQUE, MOHAMMED AL MASSARI, ABU HAFS
THE MAURITANIAN, AGUS BUDIMAN, AHMED RESSAM, SAID BAHAJI,
ZAKARIYA ESSABAR, MOHAMMED ALI HASAN AL MOAYAD, IBRAHIM
MUHAMMAD AFANDI, ABDULRAHMAN HASSAN SHARBATLY, AHMED ZAKI
YAMANI, AHMAD AL HARBI, MOHAMMED AL-ISSAIM, HAMAD HUSSAINI,
MOHAMED LOAY BAYAZID, AHMED BRAHIM, ABU MUSAB AL-ZARQAWI,
AYMAN AL-ZAWAHIRI, ABU IBRAHIM AL-MASRI, AND MOHAMMAD J. FAKIHI**

Counsel for the above-captioned Plaintiffs hereby provide a more definite statement as to Defendants Al Farooq Mosque, Mohammed Al Massari, Abu Hafs the Mauritanian, Agus Budiman, Ahmed Ressam, Said Bahaji, Zakariya Essabar, Mohammed Ali Hasan Al Moayad, Ibrahim Muhammad Afandi, Abdulrahman Hassan Sharbatly, Ahmed Zaki Yamani, Ahmad Al Harbi, Mohammed Al-Issaim, Hamad Hussaini, Mohamed Loay Bayazid, Ahmed Brahimi, Abu Musab Al-Zarqawi, Ayman Al-Zawahiri, Abu Ibrahim Al-Masri, and Mohammad J. Fakihi. This statement, annexed hereto as Exhibit 1, is hereby incorporated into the consolidated Complaints pursuant to the Court's Case Management Order No. 1, dated March 10, 2004, and Case Management Order No. 2, dated June 16, 2004, paragraph 13.

Dated: September 30, 2005

Respectfully submitted,

/S/

Michael E. Elsner, Esq. (NY - ME8337; VA-41424;
SC-72893)

Ronald L. Motley, Esq. (SC-4123)

Jodi Westbrook Flowers, Esq. (SC-66300)

Donald A. Migliori, Esq. (RI-4936; MA-567562;
MN-0245951)

Robert T. Haefele, Esq. (NJ-58293; PA-57937)

Justin B. Kaplan, Esq. (TN-022145)

John Eubanks (MD)

MOTLEY RICE LLC

28 Bridgeside Boulevard

P.O. Box 1792

Mount Pleasant, South Carolina 29465

Telephone: (843) 216-9000

Jayne Conroy, Esq. (NY-JC8611)

Paul J. Hanly, Jr., Esq. (NY-PH5486)

Andrea Bierstein, Esq. (NY-AB4618)

HANLY CONROY BIERSTEIN

& SHERIDAN, LLP

112 Madison Avenue, 7th Floor

New York, NY 10016-7416

Tel: (212) 784-6400

Attorneys for Plaintiffs